

ENRON
Transwestern Pipeline Company

P. O. Box 1188 Houston, Texas 77001 (713) 654-6161

90067782



July 27, 1987

NOTICES SECTION SUPERFUND
FILE

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NMD 094139599

Mr. Darl Mount
Pesticides & Toxic Substances Branch
U.S. EPA Region VI
1201 Elm Street
Dallas, Texas 75270

Re: Transwestern Pipeline PCB Remediation

Dear Mr. Mount:

Filed in SA Vol # 2

Pursuant to our agreement for the 25 ppm cleanup level, Transwestern has been reviewing contractor bids and selecting remedial technologies to achieve this goal. Concurrently, we have conducted a PCB risk assessment as specified in the new EPA PCB cleanup policy (52 Fed. Reg. 10688 et seq.). We have analyzed the health risks of cleanup options. Based upon these assessment results, Transwestern is hereby requesting approval for a "clean and cover" variation to the 25 ppm remediation program. The health risk assessment demonstrates that the "clean and cover" option can be implemented in a more timely and cost effective manner with no increased health risks when compared to the traditional removal and onsite incineration program.

Enclosed is an advance copy of the health risk assessment study that Transwestern completed for the Corona, New Mexico Compressor Station, one of the sites in Region 6 where Transwestern will be conducting PCB remediation efforts. This study was prepared to determine the fate of, and potential health effects of, residual PCB contamination of less than 25 ppm that might be left in place after the site remediation program is finished. Concern about this issue arose at the same time that EPA promulgated its TSCA PCB spill cleanup policy on April 2, 1987 (52 Fed. Reg. 10688 et seq.).

In that policy, EPA established uniform national standards for cleaning up PCB spills. These standards are based on the concept that the risk to human health and the environment posed by residual contamination left after cleanup varies depending upon (1) the spill location; (2) the potential exposure to PCBs; (3) the concentration of the PCBs spilled; and (4) the nature and size of the population potentially at risk (p. 10689). While this policy is applicable to spills that occur after the

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